Environmentally Critical Areas COMMENT FORM

Name:	Jim Osgood
Address/Email:	
Topic	ECA Butter Density Calculation
Comment:	To eliminate the loss of Density due to the buffers would go a long way to compensate property owners for having a public Benefit Fer having a Public Benefit
Do you have any suggestions for improvements to the meetings?	

Date:

Part Two - Critical Areas

Erosion Hazard Areas

Erosion hazard areas are those areas thought to be underlain by soils that are subject to severe erosion when exposed. The definition for erosion hazard areas includes, but is not limited to, several particular soil types that commonly erode rapidly because of the nature of their constituents and the engineering properties of the soil. The mapped extent of erosion hazard areas is based upon past regional soils mapping by several government agencies and is somewhat generalized. For this reason, specific site evaluations are sometimes necessary to quantify the actual nature and degree of erosion hazard. Often, such investigations are part of larger studies that evaluate landslide or steep slope hazards.



Development standards

To insure that development within erosion hazard areas does not result in erosion or sedimentation problems, either within the affected parcel or on adjacent properties, clearing and grading is sometimes regulated and erosion-control techniques are sometimes mandated. These restrictions commonly affect larger developments more than smaller ones, and many single-family residential proposals are not significantly impacted. The regulations state that:

- 1. Clearing in an erosion hazard area is only allowed from April 1 to October 1, except that clearing of up to 15,000 square feet may occur at any time (most single-family residences fall well below this amount of clearing).
- 2. Clearing of noxious weeds may occur at any time.
- 3. Forest practices (logging) regulated by the department are allowed at any time in accordance with a Clearing and Grading Permit if the harvest is in conformance with applicable state laws.

All subdivisions, short subdivisions, binding site plans, or urban planned developments within erosion hazard areas are required to retain all existing vegetation until the applicable building permits are issued for individual lots. Erosion and sedimentation control plans are considered under the building permit review. However, larger-scale clearing may be approved if it is part of a larger-scale grading plan.

If the department determines that erosion from a development site poses a risk of damage to downstream wetlands or aquatic areas, then regular monitoring of the development activity may be required. If water quality standards are not met, further development work may be suspended until such standards are met.

Allowed alterations

All alterations are allowed provided they are done using appropriate sedimentation and erosion control practices. Erosion and sedimentation control plans are commonly required at time of permit application review, especially for larger residential and commercial developments.

http://your.kingcounty.gov/ddes/cao/Manual/II-Erosion.pdf

EXHIBIT NO. 115.

Public Comment regarding Public comment 88:

#	Date Submitted	Name	Summary of Comment	Affected Code Section	Staff Comments
88.	4/19/2012	Anon	Question about BAS support for an isolated wetland of 1,000 sq. ft.	• 21A.15.1410 (Wetland, isolated)	Generally, exemptions are not based on BAS, but are policy choices. According to Wetlands Guidance for Small Cities – Western Washington Version (Department of Ecology, January 2010), the scientific literature does not support exempting wetlands that are below a certain size and explains that it is not possible to conclude from size alone the range of functions a particular wetland may be providing.
					However, in recognition of the potential administrative desire to place a size threshold on wetlands to be regulated, Ecology has developed some non-BAS-based guidance for potential exemption of small wetlands when additional criteria are considered. A recent comment letter from the Department of Ecology identified some of these options for increasing wetland exemption levels in some circumstances. Staff will be providing more information about these options for the May 17 meeting.

Staff comments that "the scientific literature does not support exempting wetlands that are below a certain size and explains that it is not possible to conclude from size alone the range of functions a particular wetland may be providing."

Question 1: At what size does the BAS scientific literature support not exempting wetlands? In other words, what size does the scientific evidence show that a wetland should not be disturbed, period?

Question 2: I have heard that studies have never been done related to wetlands below 10,000 sf. If that is not so, please let us know the study source.

Question 3: if a 10,000 sf wetland has a low value and function, why should it not be exempted?

Question 4: What does BAS define as low value and function of as wetland?

James Osgood 19661 SE 24th Way Sammamish, Wa



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Name:	1306 500-NSM
Address/Email:	
Topic	
Comment:	
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	EXHIBIT NO.
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